

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**ISAAC SUTOR,**

Plaintiff,

v.

**AMERIGROUP CORPORATION,**

Defendant.

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**Civil Action No. 1:19-cv-01602**

**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Plaintiff Isaac Sutor and Defendant Amerigroup Corporation, through their respective attorneys of record, pursuant to Fed. R. Civ. P. 26(c), respectfully jointly move the Court for entry of the attached Stipulated Protective Order and state as follows in support:

1. The parties contemplate that discovery in this action may involve the production or disclosure of trade secrets, confidential personal, financial or business information and/or competitive information.

2. To ensure the protection of such information from public disclosure, the parties request entry of a Stipulated Protective Order in this case, a copy of which is attached hereto as **Exhibit 1.**

3. As evidenced by the electronic signatures of counsel for the parties on the proposed Stipulated Protective Order, Plaintiff and Defendant, by counsel, consent to jointly move to enter the attached Stipulated Protective Order.

4. Because the parties have agreed to the entry of the proposed Stipulated Protective Order, no hearing on this Joint Motion is necessary unless desired by the Court.

WHEREFORE, Plaintiff Isaac Sutor and Defendant Amerigroup Corporation, by counsel, respectfully request that the Court grant their Joint Motion and enter the attached Stipulated Protective Order.

Respectfully submitted, this 20<sup>th</sup> day of April, 2020.

/s/ Kristi C. Kelly

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